

March 18<sup>th</sup> 2008

**Citizen Name / Ex. 6**

Rosemont Copper Project EIS Initial Comments:

These are initial comments and I reserve the right to add additional comments within the stated 30 day period commencing March 12, 2008. \*

This project by its very nature is extremely sensitive. There is a large possibility for conflict of interest. This was evidenced by the initial exclusion of an area which would feel direct impacts of this project should it go forward from being engaged in an open public forum during the initial 30 day scoping period. Although that particular issue has now been resolved, it makes one wonder if it has set the tone for this entire process which may take years.

It is my belief that out of fairness to all of the surrounding communities who will be impacted by this project, to include those in Santa Cruz, Pima and Cochise Counties, more specifically the communities who would be immediately and directly impacted by the proposed project (Vail and Sonoita)\* that the Coronado National Forest should be excused as the lead agency on this project, ask another lead agency to be named and ask to be named as a cooperating agency.

Additionally, I believe the following agencies should be given invitation as cooperating agencies throughout this process if they have not already been asked.

1. ADOT –Sonoita Highway 83 is an ADOT road and will be severely impacted by this project and other cumulative impacts in the area. To exclude ADOT as a cooperating agency would be sheer negligence.
2. Border Patrol Sonoita Highway and the outlying feeders are frequented by undocumented workers.
3. The Arizona Corporation Commission- As stated in the Forest Service NOIS “Projected related activities to be addressed in the EIS include, but are not limited to, the following: ... Construction and operation of infrastructure such as their corridors on NFS lands”. The CEC process for these facilities is long and arduous and it is appropriate to invite the ACC.
4. The Rincon Institute- This not for profit agency is the closest local agency with expertise on the Cienega Watershed/Cienega Corridor which will experience direct impacts if the proposed project is approved

This list is not comprehensive not is the following:

A list of “interested parties” and community leaders who should be considered for public input from the Vail/Cienega Corridor as follows: (please feel free to contact me if you need addresses or phone numbers)-again, not comprehensive

Vail Preservation Society  
Santa Rita Neighborhood Association  
Hilton Ranch Neighborhood Association  
Empire-Fagan Coalition  
A.W. Marrs Development  
Andrada Ranch  
Vail C.A.R.E.S. Community Action Board  
Vail Unified School District  
Vail Education Foundation  
Rincon Valley Fire Department  
Corona De Tucson Fire Department  
Highway Patrol  
Pima County Sheriff's Department  
Rincon Valley Coalition  
Cienega Watershed Board  
Cienega Corridor Conservation Council  
Colossal Cave Mountain Park  
South East Business Alliance  
Cienega Rotary  
Local businesses  
Local churches  
Local homeowner's associations  
Local developers  
Local ranchers  
The Optimist Club

Additionally, while the Census Data may indicate that the area does not present significant Environmental Justice issues, I would suggest that during the process the lead agency investigate the region more thoroughly at the "ground level", especially given the number of cumulative impacts in the region. There are many modest manufactured home communities in rural pockets along Sonoita Highway 83 and into the hills, unseen from the roadway. Also, keep in mind that this project will have impacts to the south into Santa Cruz County where Environmental Justice will address ethnicity as well as socioeconomic conditions.

Information taken from the CEQ NEPA Regs Handbook "1. Scoping  
During the scoping process, an agency should preliminarily determine whether an area potentially affected by a proposed agency action may include low-income populations, minority populations, or Indian tribes, and seek input accordingly. ***When the scoping process is used to develop an EIS or EA, an agency should seek input from low income populations, minority populations, or Indian tribes as early in the process as information becomes available.*** 26. Any such determination, as well as the basis for the determination, should be more substantively addressed in the appropriate NEPA documents and communicated as appropriate during the NEPA process. If an agency

identifies any potentially affected minority populations, low-income populations, or Indian tribes, the agency should develop a strategy for effective public involvement in the agency's determination of the scope of the NEPA analysis. If an agency identifies any potentially affected minority populations, low-income populations, or Indian tribes, the agency should develop a strategy for effective public involvement in the agency's determination of the scope of the NEPA analysis. Customary agency practices for notifying the public of a proposed action and subsequent scoping and public events may be enhanced through better use of local resources, community and other nongovernmental organizations, and locally targeted media. "

"The following steps may be considered, as appropriate, in developing an innovative strategy for effective public participation:

- | Coordination with individuals, institutions, or organizations in the affected community to educate the public about potential health and environmental impacts and enhance public involvement;
- | Translation of major documents (or summaries thereof), provision of translators at meetings, or other efforts as appropriate to ensure that limited-English speakers potentially affected by a proposed action have an understanding of the proposed action and its potential impacts;
- | Provision of opportunities for limited-English speaking members of the affected public to provide comments throughout the NEPA process;
- | Provision of opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments;
- | Use of periodic newsletters or summaries to provide updates on the NEPA process to keep the public informed;
- | Use of different meeting sizes or formats, or variation on the type and number of media used, so that communications are tailored to the particular community or population;
- | Circulation or creation of specialized materials that reflect the concerns and sensitivities of particular populations such as information about risks specific to subsistence consumers of fish, vegetation, or wildlife;
- | **Use of locations and facilities that are local, convenient, and accessible to the disabled, low-income and minority communities, and Indian tribes;** and
- | Assistance to hearing-impaired or sight-impaired individuals.

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<http://ceq.eh.doe.gov/NEPA/regs/ej/justice.pdf>

As a community volunteer, I welcome the opportunity to work with the lead agency to identify areas of concern. I am one of many team leaders in our diverse region and hope the process will work more efficiently in the future.

Thank you,

**Citizen Name / Ex. 6**

*\*(I would add Sahuarita on the list of communities that should have a meeting as well)*

*\*(It has been changed to the middle of May)*